



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: SNF - Riceboro
Facility Address: Chemical Plant Road
Riceboro, Georgia 31323 Liberty County
Mailing Address: P.O. Box 250
Riceboro, Georgia 31323
Parent/Holding Company: SNF Holding Corporation
Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The modification of existing permitted Liquids Line 13 (LQ13) and installation of new Liquids Line 14 (LQ14) for the Phase V Chemtall Plant.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2899-179-0011-V-04-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. 628420 dated August 25, 2022; any other applications upon which this Amendment or Permit No. 2899-179-0011-V-04-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 8 pages.



Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

SNF Holding Company (SNF) proposes to modify existing permitted Liquids Line 13 (LQ13) and install new Liquids Line 14 (LQ14) for the Phase V Chemtall Plant at the SNF facility in Riceboro, Georgia.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.2 Additional Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
LQ – Liquids Product Lines				
LQ13	Liquids Products Line 13	40 CFR 63 Subpart FFFF ²	CE6	Packed-Bed Scrubber
<u>LQ14</u>	<u>Liquids Products Line 14</u>		CE7A	Two-Stage Packed-Bed Scrubber
			CE7B	

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

¹Group 1 source. ²Group 2 source. ³Group 1 source for MMA. Group 2 source for MA, but controlled at all times. ⁴Not subject to 40 CFR 63 Subpart FFFF emission controls, but voluntarily controlled at all times. ⁵If decanter bottoms are transferred offsite for disposal, the decanter bottoms will be considered a Group 1 process wastewater and the trailers, along with T300, T620, and/or T22 will be defined as MON Rule wastewater containers.

**Offline backup to Cryogenic Condenser Recovery Unit CC02.

** CMI1/CMS1 will be removed once Cryogenic Condenser Recovery Unit CC02 is installed.

3.2 Equipment Emission Caps and Operating Limits**CHEMTALL PLANT/FLOCRYL CHLOROMETHYLATION PLANT****MODIFIED CONDITION**

3.2.14 The Permittee shall not discharge or cause the discharge into the atmosphere from Liquids Product Lines 13 and 14 (Source Codes LQ13 and LQ14) through Stack SE55 any gases which:

[Toxic Guideline - 391-3-1-.02(2)(a)1]

- Contain acrylamide in excess of ~~0.403~~ 0.663 pounds during any consecutive 12-month period.
- Contain acrylic acid in excess of 115 pounds during any consecutive 12-month period.

MODIFIED CONDITION

3.2.15 The Permittee shall not produce IPA-dispersants in Liquids Product Lines 13 and 14 (Source Codes LQ13 and LQ14).

[Avoidance of 40 CFR 52.21]

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements****CHEMTALL PLANT****MODIFIED CONDITION**

- 4.2.10 Within 60 days after achieving the maximum production rate at which the Liquids Product Lines 13 and 14 (Source Codes LQ13 and LQ14) will be operated, but no later than 180 days following the production of Liquids products that either contain acrylic acid or that result in a new worst-case batch for acrylamide for LQ13 and/or the startup of LQ14, the Permittee shall conduct acrylic acid and/or acrylamide performance tests on Stack SE55 (Scrubber CE7A/CE7B). The Permittee shall, at a minimum, conduct the testing while processing the worst-case product batch(es) for acrylamide and/or acrylic acid. The testing shall be conducted over the entire batch and the data shall be used to develop emission factors in terms of pounds of acrylamide / acrylic acid per ton of product. The Permittee may elect to test other product batches in addition to those discussed above for the purpose of obtaining data for specific product mixes. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

No Changes.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

Condition 6.1.7.b.i through Condition 6.1.7.b.vii – No Changes

CHEMTALL PLANT/FLOCRYL CHLOROMETHYLATION PLANT**MODIFIED CONDITION**

- viii. Any 12-month rolling period during which the acrylamide or acrylic acid emissions from Liquids Product Lines 13 and 14 (Source Codes LQ13 and LQ14), calculated in accordance with Condition 6.2.28, is in excess of the limit in Condition 3.2.14.

[Toxic Guideline - 391-3-1-.02(2)(a)1]

MODIFIED CONDITION

- ix. Any period of process operation during which IPA-dispersants are produced in Liquids Product Lines 11 through 14, 12, or 13 (Source Codes LQ11 through LQ13-LQ14).

[Avoidance of 40 CFR 52.21]

Condition 6.1.7.b.x through Condition 6.1.7.b.xiv – No Changes

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

No Changes

- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

No Changes

6.2 Specific Record Keeping and Reporting Requirements

CHEMTALL

MODIFIED CONDITION

- 6.2.25 The Permittee shall maintain monthly records of the types and amounts (in tons) of product produced in Liquids Product Lines 1 through ~~13~~ 14 (Source Codes LQ01 through ~~LQ13~~ LQ14).
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

MODIFIED CONDITION

- 6.2.28 The Permittee shall use the emission factor data collected in accordance with Conditions 4.2.7, 4.2.9, and 4.2.10 and the production records required by Condition 6.2.25 to calculate monthly acrylamide and acrylic acid emissions from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10), Liquids Product Lines 11 and 12 (Source Codes LQ11 and LQ12), and Liquids Product Lines 13 and 14 (Source Codes LQ13 and LQ14). The Permittee shall use the worst-case emission factor for each product unless additional testing has been conducted to establish specific factors for a particular product. The monthly totals shall be used to calculate 12-month rolling totals to demonstrate compliance with the limits in Conditions 3.2.9, 3.2.12, and 3.2.14. For any month during which emissions exceed one twelfth of the applicable limit, the facility shall provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the notification level. The written notification shall include the following:
[Toxic Guideline - 391-3-1-.02(2)(a)1]

- a. The month in which the notification level was exceeded.
- b. The total emissions for the month for the applicable pollutant.
- c. The facility's plan to ensure that the applicable emission limit is not exceeded.

NOTIFICATIONS

MODIFIED CONDITION

- 6.2.55 The Permittee shall furnish the Division written notification as follows for the operations at the Chemtall Plant. For the purpose of this Permit, "startup" shall mean the setting in operation of a source for its intended purpose.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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- a. The actual date of the initial startup of Emulsion Plant Line 42 (Source Code EM42), ~~and~~ Liquids Plant Lines 9 and 10 (Source Codes LQ09 and LQ10), and Liquids Plant Line 14 (Source Code LQ14) within 15 days after such date.
- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the application for the equipment.
- c. If performance testing following the startup of the new line(s) will not be required based on the scenario described in Permit Condition 4.2.11 where the worst case emissions scenario is not changing, a statement indicating as such shall be included in the notification.

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.4 Insignificant Activities Associated with this Amendment

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

Attachments

B. Insignificant Activities Checklist

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ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
Trade Operations	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	
Maintenance, Cleaning, and Housekeeping	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
	2. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	3. Portable blast-cleaning equipment.	
	4. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	5. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	6. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	7. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	422 <u>425</u>